

United States Department of Justice

United States Attorney Northern District of New York

100 South Clinton Street, P.O. Box 7198 James M. Hanley Federal Building Syracuse, New York 13261-7198 Tel.: (315) 448-0672 Fax: (315) 448-0646

March 29, 2024

VIA CM/ECF

Hon. Thérèse Wiley Dancks U.S. Magistrate Judge Federal Building and U.S. Courthouse P.O. Box 7346 Syracuse, New York 13261-7346

Re: Long et al. v. U.S. ICE & U.S. CBP: Joint Status Report

Civil Action No.: 5:23-CV-1564 (DNH/TWD)

Dear Judge Dancks:

This office represents Defendants in this Freedom of Information Act ("FOIA") case. Please accept this letter as a report on the conference as a joint status report as required by this Court's Text Order dated March 6, 2024. See Dkt. # 20. Since the Rule 26(f) conference held on February 29, 2024, the parties have met and conferred through counsel on March 11, 2024, and March 28, 2024. Additionally, on March 26, 2024, counsel and representatives from the respective parties held a meet-and-confer session. Counsel and the parties continue to discuss matters raised at the March 26, 2024, meet-and-confer session. The parties believe further discussions would continue to produce progress toward either resolving the case and/or sharpening the issues before the Court. Thus, the parties have agreed to continue the process in April 2024, with a joint status report due to the Court by April 29, 2024.

Therefore, the parties jointly and respectfully request that this Court enter an Order directing the parties to file a joint status report on or before April 29, 2024 regarding the status of their discussions.

CARLA B. FREEDMAN United States Attorney

By: /s/

David M. Katz Assistant United States Attorney

Bar Roll No. 700065